

Chen, Isaac

From: Trujillo, Erin S, NMENV [erin.trujillo@state.nm.us]
Sent: Tuesday, May 07, 2013 7:35 PM
To: Chen, Isaac
Cc: Hogan, James, NMENV; Yurdin, Bruce, NMENV; Larsen, Brent; Giglio, Larry; Holcomb, Sarah, NMENV
Subject: RE: LANL permit
Attachments: Yurdin-TrujilloFact Sheet 2013.docx; ETrujillo-Draft Part I.doc

Isaac,

Below are preliminary comments to meet your deadline by May 8. I plan to be in the office this week in case you have questions. Please feel free to call at 505-827-0418. Erin

Fact Sheet

-Attached are Bruce Yurdin's and my comments on the draft Fact Sheet. These comments include the sections in the fact sheet where EPA proposes not to determine the reasonable potential to exceed for the persistent human health numeric criteria for the Limited Aquatic Life designated use of 20.6.4.128 NMAC receiving waters.

-As previously commented, biosolids information in Fact Sheet was outdated. Michael Saladen, LANL provided additional information on SWWS Compost Registration Issue in e-mail dated May 06, 2013.

-Default Hardness (see below). EPA used the default non-zero harmonic mean flow of 0.001 MGD as described by the NMIP.

-Effluent Hardness (see below).

-For Outfall 051, it is not clear why the Total Hardness Range is between 45 mg/l and 55 mg/l. To be protective, it appears that the range needs to be between 45 mg/l and 50 mg/l.

-Has/Would EPA consider having Permittee measure hardness and calculate the WQS limit (using a hardness calculator) for each discharge?

-For Outfall 03A022 and based on my conversation with Mike Saladen this afternoon, authorization for discharge of emergency cooling non-contact once-thru potable water is still requested. I have not researched LANL's application or the December 2011 Notice of Changed Condition letter to confirm that this is clear in their application. WQBEL for TRC would be required. See additional comments on Draft Permit.

-WET requirements will need to be reviewed/edited based on comments attached (see below)

-Impairments on Integrated List were not summarized on Fact Sheet (see below).

RP

-As previously commented, draft RP analysis used spreadsheets revised as of May 1, 2012. EPA's last version of spreadsheet provided to NMED was revised as of May 18, 2012. Use of the most recent spreadsheet appears needed unless justified. Also, please note that the most recent spreadsheet provided by EPA is not clear about the Default Hardness (units missing). The spreadsheet says use 0.001. According to the NMIP and as correctly used in the Draft RPs, use 0.001 MGD (0.00155 cfs).

-Unless I missed it, source (calculation?) for effluent hardness is not documented. For example for Outfall 199, based on magnesium on Form 2c, using calculator, the Hardness is in the 40's mg/L.

-Receiving Water misspelled for Outfall 001 and 03A027 (Canyon, not Canton)

-Remove "USGS" and "SJR"

-Waterbody Segment identified for Outfall 13S to Canada del Buey is incorrect. Change to 20.6.4.128.

-For Outfall 199, it appears that EPA is using downstream water 20.6.4.126 NMAC (Outfall 199 above 001). LANL's application states that discharge is to perennial portion of Sandia Canyon may be incorrect. Two RPs may be needed/appropriate. Draft RP needs to be corrected because the actual approach is for Waterbody Segment 20.6.4.126 (RP says 128). However, for Outfall 199, to ensure that there is no reasonable potential, it appears that a second RP may be needed for 20.6.4.128 (No chronic aquatic life considered for Outfall 03A199, 4Q3 = 0, Harmonic Mean 0.00155 cfs).

-I have not compared application effluent concentrations with the Ce used in the RP. I assume that EPA has done review/double checked values.

Draft Permit

-Your comment below, *"Because NMED has not categorized 20.6.4.108 as ephemeral streams, I changed WET requirements based on discharges to an intermittent stream"* needs to be clarified. Citation to 20.6.4.108 NMAC is not applicable here, but I think I understand what you are saying. Hydrologic Protocols have not been conducted for the receiving streams. WET testing requirements in NMIP Table 11 area are selected based on designated uses (DU = AL or DU = LAL) and perennial, intermittent, and ephemeral. For 20.6.4.128, the designated use is limited aquatic life (i.e., species/frequencies for "ephemeral" should be applicable). For 20.6.4.126, the standard refers to "perennial portions" and the designated use is coldwater aquatic life at this time (i.e., species/frequencies for "perennial" should be applicable).

-For Outfall 001 (discharges to 20.6.4.126 NMAC) with designated use of secondary contact, the monthly geometric mean of E. coli bacteria of 548 cfu/100 mL and single sample of 2507 cfu/100 mL apply to this use (see 20.6.4.900.E. NMAC).

-My notes and additional comments are on the draft permit are attached. NMIP tables for frequency provided for informational purposes. Excerpts from NMIP tables for WET are provided for each outfall.

-My notes and additional comments on impaired waters are provided for each outfall. Please consider (as Permit Writer's BPJ) if Monitoring and Reporting for Probable Causes of Impairment is needed. This is still under consideration.

-Part II.E (REOPENER CLAUSE) only says, "The permit may be reopened and modified during the life of the permit, in accordance with provisions in 40 CFR 122.62." There is more language in NMIP to address impairments.

-Part II WET testing language will need to be reviewed/edited based on comments attached.

From: Chen, Isaac [mailto:Chen.Isaac@epa.gov]

Sent: Wednesday, May 01, 2013 8:42 AM

To: Trujillo, Erin S, NMENV

Subject: RE: LANL permit

Erin,

NMED reviewed the draft before. Because NMED has not categorized 20.6.4.108 as ephemeral streams, I changed WET requirements based on discharges to an intermittent stream. Fact sheet also reflects or addresses some NMED's comments. Please send your comments to me by May 8th or sooner. We want this out for PN this month. Thanks.